

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

KATYRECE S. HALL, )  
PLAINTIFF, )  
v. ) CASE #:2:06-cv-00588-MEF-VPM  
LEONARD ROSS CRANE, )  
MAYTAG SALES, .INC., and )  
factitious parties A - D, )  
DEFENDANTS. )

**MOTION TO ENTER PROTECTIVE ORDER**

**COMES NOW** Defendant Maytag Sales, Inc. and herewith shows unto the Court the parties have entered into a confidentiality agreement related to the inspection by Plaintiff's attorneys of the personnel file of Leonard Ross Crane. The agreed to Confidentiality Agreement is attached to this Motion and has been signed by all parties. Defendant Maytag Sales, Inc. moves this Court to enter an Order adopting the Confidentiality Agreement.

/s/ Randall Morgan  
RANDALL MORGAN [8350-R70R]  
Attorney for Defendants Maytag Sales, Inc.  
and Leonard Ross Crane  
HILL, HILL, CARTER, FRANCO, COLE & BLACK, P.C.  
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Montgomery, Alabama 36101-0116

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document via electronic filing and U.S. Mail, first-class postage prepaid, on this the 19<sup>th</sup> day of March, 2007:

Carol Gerard, Esq.  
Andy Nelms, Esq.  
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/s/ *Randall Morgan* \_\_\_\_\_ OF  
COUNSEL